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Attorney for Defendant
MIMI WANG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) CR No(s).CR 11-0804 MMC
Plaintiff,)
v.)
MIMI WANG,)
Defendant.)

**UNOPPOSED [PROPOSED] ORDER
FOR ALTERNATIVE BRIEFING
SCHEDULE**
AND ORDER THEREON

The Defendant's Motion to Suppress is currently scheduled to be heard on July 11, 2012 at 2:15 p.m. with the following briefing schedule:

Defense Motion Due: June 13, 2012

Opposition Due: June 27, 2012

Reply Due: July 3, 2012

____ Counsel for the Ms. Wang, and the counsel for the Government are seeking a Judicial Conference with Judge Laurel Beeler in an attempt to settle this case. Counsel respectfully request a motion hearing date of August 1, 2012 at 2:15 p.m. with the following alternative briefing schedule:

UNOPPOSED [PROPOSED] ORDER FOR ALTERNATIVE BRIEFING SCHEDULE

1 Defense Motion Due: June 27, 2012

2 _____ Opposition Due: July 11, 2012

3 _____ Reply Due: July 18, 2012

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5 No party objects to the requested continuance and alternative briefing schedule.

6 The parties request that the period from July 11, 2012 through August 1, 2012 also be
7 excluded from any time limits applicable under 18 U.S.C. § 3161. The parties agree that
8 granting the exclusion would allow the reasonable time necessary for effective preparation of
9 counsel and would preserve continuity of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The
10 parties also agree that the ends of justice served by granting such an exclusion of time outweigh
11 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).
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14 SO STIPULATED:

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17 DATED: June 04, 2012

/s/

18 JOHN RUNFOLA
Attorney for MIMI WANG

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20 DATED: June 08, 2012

/s/

21 DAMALI TAYLOR
Assistant United States Attorney

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23 [PROPOSED] ORDER

24 For the reasons stated above, the Court finds good cause to change the date for the motion
25 hearing from July 11, 2012 to August 1, 2012 and impose the alternative briefing schedule. The
26 Court also finds that the exclusion from the time limits applicable under 18 U.S.C. § 3161 of the
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28 UNOPPOSED [PROPOSED] ORDER FOR ALTERNATIVE BRIEFING SCHEDULE

1 period from July 11, 2012 through August 1, 2012 is warranted and that the ends of justice
2 served by the continuance outweigh the best interests of the public and the defendant in a speedy
3 trial. 18 U.S.C. §3161(h)(7)(A). The failure to grant the requested exclusion of time would deny
4 counsel for the defendant and for the government the reasonable time necessary for effective
5 preparation, taking into account the exercise of due diligence, and would result in a miscarriage
6 of justice. 18 U.S.C. §3161(h)(7)(B)(iv).

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8 IT IS SO ORDERED.

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10 DATED: June 12, 2012

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12 THE HONORABLE JUDGE MAXINE CHESNEY
13 United States District Judge

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28 UNOPPOSED [PROPOSED] ORDER FOR ALTERNATIVE BRIEFING SCHEDULE